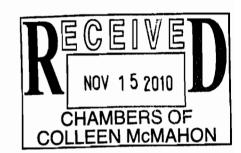
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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
SHIPCO TRANSPORT INC.	X
SHIFCO TRANSFORT INC.	
Plaintiff,	:
	:
-against-	:
	:
JDB INTERNATIONAL INC. and	:
LAPTON FREIGHT INTERNATIONAL	:
LIMITED,	:

Defendants.

09 cv 7532 (CM)

ECF CASE



DEFENDANT'S NOTICE OF MOTION FOR STAY OF DISCOVERY

Upon the accompanying Memorandum of Law, and pleadings heretofore had herein,
Defendant, LAPTON FREIGHT INTERNATIONAL LIMITED (HONG KONG), will move this
Court before the Honorable Colleen McMahon, United States Courthouse, 500 Pearl Street,
Courtroom 14-C, New York, New York for an order pursuant to Federal Rules of Civil
Procedure 26(c) staying discovery pending a decision on Defendant's Motion to Dismiss
Plaintiff's Amended Complaint.

November 12, 2010

MEMO ENDORSE APTON FREIGHT INTERNATIONAL, INC. Hong Kong)

MEMO ENI

Patrick F. Lennon (PL2162)
Anne C. LeVasseur (AL3333)
LENNON, MURPHY, CAULFIELD
& PHILLIPS, LLC
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AFFIRMATION OF SERVICE

I hereby certify that on November 12, 2010, a copy of the foregoing Notice of Motion for Stay of Discovery was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's CM/ECF system.

By: Anne C. LeVasseur